

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case Number: 00-6309-CR-Seitz/Garber

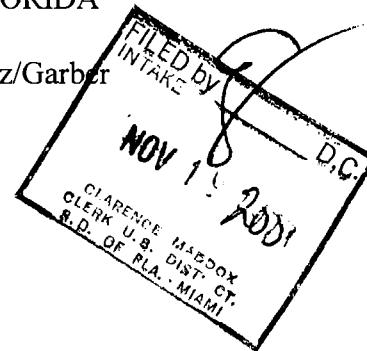
UNITED STATES OF AMERICA

Plaintiff,

v.

DAVID BELL,

Defendant.



**MOTION TO EXTEND TIME TO FILE PRE-TRIAL MOTIONS.**

NOW COMES the Defendant, DAVID BELL, by and through his undersigned attorney, and respectfully files this Motion to Extend the Time to File Pre-Trial Motions and in support thereof states the following:

1. Pre-Trial Motions on this case are due to be filed on or before November 19, 2001.
2. Undersigned counsel commenced a Murder in the first degree trial on October 29, 2001, State of Florida v. David Nord, Case No. 94-18567 CF10A. Said trial lasted through November 6, 2001.
3. Undersigned counsel immediately commenced another Murder in the first degree trial to wit: State of Florida V. Pui Kei Wong, Case No. 98-001287 CF10A. This trial started on November 13, 2001, and as of this date is still ongoing. The three (3) days between trial were utilized by interviewing witnesses and preparing cross-examination.
4. Due to preparing for and being in trial on two (2) separate murder trials, undersigned counsel has not had an opportunity to file all pre-trial motions. Wherefore, undersigned

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JEFFREY M. HARRIS, P.A.

counsel is requesting additional time to file said pre-trial motions.

5. At the time of this Motion undersigned counsel has been unable to contact Brian McCormick, prosecutor in the case *subjudice*.

WHEREFORE, the Defendant respectfully prays unto this Honorable Court allowing the Defendant, David Bell, three additional weeks to file pre-trial motions.

Respectfully submitted,

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I HEREBY CERTIFY that a true and correct copy of this foregoing has been furnished by U.S. Mail this 16 day of November, 2001, to the following listed attorneys.



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